

IPM *Resources LLC*

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"an intellectual property management resource company"

October 01, 2021

VIA CDX

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Document Processing Desk (REGFEE)
Office of Pesticide Programs (7504C)
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460
Attn: Elizabeth Fertich/PM 4

Subject: PRIA Label Amendment
Gharda Permethrin Technical, EPA Reg. No.: (93182- 5)
Gharda Chemicals International Inc

Dear Ms. Fertich:

Gharda Chemicals International Inc. ("Gharda") is applying to the U.S. Environmental Protection Agency ("EPA") pursuant to Section 3 of the Federal Insecticide, Fungicide, and Rodenticide Act ("FIFRA") as a PRIA Action to Amend its product label "Gharda Permethrin Technical" containing the Active Ingredient Permethrin.

Gharda holds an Active Registration for Gharda Permethrin Technical (EPA Registration Number 93182-5) as a Technical Grade Active Ingredient (TGAi) for use in manufacturing end-use products for Terrestrial Food Crop and Terrestrial Nonfood applications. Gharda is requesting update of its Permethrin Technical label adding several new crops and additional Crop Group listings to the Directions for Use Section of the label (see Table below) to meet parity with other currently registered Permethrin Technical labels, as well as updated label revisions to Precautionary Statements, Environmental Hazards, and Storage and Disposal Statement Sections of the Gharda Permethrin Technical label. A highlighted and clean copy with the changes to labelling is included with this submission.

Requested Amendments to the Directions for Use Section of the Gharda Permethrin Technical Label.

Current Label	Proposed Change
amaranth (Chinese); chervil; chrysanthemum (garland); cress (garden/upland); dandelion; dock (sorrel); endive (escarole); garden purslane; lettuce (leaf);	Replace individual crops within "Leafy greens, subgroup 4A"

parsley; roquette (arugula); spinach (New Zealand); and winter purslane	
Apple Pear	Replace individual crops within "Pome fruit, group 11"
Celery Rhubarb	Replace individual crops within "Leaf petiole vegetables, subgroup 22B"
Cherries	Replace with crop subgroup "Cherry subgroup 12-12A"
Cress (garden/upland/water)	Replace garden cress and upland cress with subgroup 4A as described above. Leave cress (water) but change to read "Watercress"
Cucurbits Melons (incl. cantaloupe) Pumpkin Squash (winter)	Replace within crop group "Cucurbit vegetables, group 9"
Leafy vegetables (except Brassica)	Remove because covered by subgroup 4A or subgroup 22B
Peach	Replace within crop subgroup "Peach subgroup 12-12B"
Potato	Replace within crop subgroup "Tuberous and corm vegetables, subgroup 1C"
--	Add "alfalfa grown for seed" following alfalfa
--	Add "asparagus fern" following asparagus
--	Add "celtuce" following cauliflower
--	Add "cabbage (Chinese)" following cabbage
--	Add "grown for seed" to corn following field/sweet/pop
--	Add "fennel, Florence" following fennel
--	Add "fruit, small, vine climbing (except fuzzy kiwifruit), subgroup 13-07F" following filbert (hazelnut)
--	Add "kiwifruit" following horseradish
--	Add "kohlrabi" following kiwifruit
--	Add "tomatillo" following spinach (New Zealand)

In consideration of this Amendment review, Gharda Permethrin Technical label is significantly similar to FMC Pounce Technical Insecticide Label (EPA Reg. No.: 279-3013).

Gharda is not claiming the Formulator's Exemption therefore attached with this submission Gharda is submitting a updated copy of the Data Matrix (EPA Form 8570-35), and a updated Certification With Respect to Citation of Data Form (Form 8570-34), both Forms dated October 01, 2021.

Gharda's application uses the straight Selective Method of data support (40 C.F.R. § 152.90-.96). Under the straight Selective Method, an applicant must list the specific data requirements applicable to its product, and then demonstrate compliance with each requirement by one or more of several methods. To comply with the application data requirements, Gharda is submitting certain data of its own and is selectively citing specific studies to satisfy other data requirements. The attached updated Data Matrix (EPA Form 8570-35, Dated 10/01/2021) lists specific studies cited by Gharda.

Gharda also advises the Agency that Gharda is a member in good standing of the Permethrin Data Group II Steering Committee/Joint Venture (PDG II SC/JV) and has been since its inception in 2011. Where data is required by the Agency, for example, as per the Dec. 12, 2012 *Permethrin Generic Data Call-In* (GDCI-109701-1252) (GDCI), and at any point thereafter, Gharda were entitled to rely on PDGII SC/JV data requested by the Agency in support of Gharda Permethrin Technical.

Enclosed with this submission are the following documents:

This letter serves as both the TRANSMITTAL DOCUMENT and COVER LETTER

- Transmittal Form (EPA Form 8570-1).
- Certification With Respect to Citation of Data (EPA Form 8570-34).
- Updated Data Matrix (EPA Form 8570-35, Dated: 10/01/2021).
- Amended Label (clean), Gharda Permethrin Technical (93812-5)
- Amended Label (highlighted), Gharda Permethrin Technical (93812-5)
- PRIA (R352) electronic payment confirmation.

If you have questions, please contact me by phone at 215 595-4521 or by email at frank_sobotka@msn.com . Thank you very much for your cooperation.

Sincerely yours,



Frank E. Sobotka, PhD (Agent for Gharda Chemicals International Inc)
IPM Resources LLC

CC: Ramanathan Seethapathi, Gharda Chemicals International Inc